

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

BRANDON LEE ROANE, on behalf of himself and all others similarly situated,

Plaintiff,

v.

GRMC, INC., doing business as Garrett Regional Medical Center,

Defendant.

Case No. 1:24-cv-00141

Judge Stephanie A. Gallagher

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant GRMC, Inc. ("Defendant") respectfully moves for an extension of time to and through **March 8, 2024**, to file its responsive pleading. As grounds therefore, Defendant states as follows:

1. On November 20, 2023, Plaintiff filed his Class Action Complaint in Garrett County Circuit Court alleging negligence and other causes of action against Defendant stemming from the 2023 cyberattack on the Progress Software MOVEit transfer application.
2. Defendant timely removed this action to the United States District Court for the District of Maryland on January 16, 2024.
3. Defendant's response to Plaintiff's Complaint is currently due January 23, 2024.
4. On October 4, 2023, the Joint Panel on Multidistrict Litigation (JPML) issued a Transfer Order consolidating actions relating to the 2023 cyberattack on the Progress Software MOVEit transfer application. The JPML assigned the consolidated proceeding to Judge Allison D. Burroughs in the District of Massachusetts and broadly noted that other

actions, including yet-to-be filed actions, relating to the cyberattack—whether filed against Progress Software, direct users of the MOVEit software, or companies that contracted or subcontracted with direct users of MOVEit—are potential tag-along actions that may be transferred to the District of Massachusetts.

5. Defendant tagged this action for inclusion in the MDL on January 17, 2024.
6. The responsive pleading deadline for all actions in the MDL is stayed pending appointment of leadership and consolidation and scheduling of transferred actions.
7. Defendant met and conferred with Plaintiff regarding an extension of Defendant's deadline to respond to Plaintiff's Complaint should transfer to Judge Burroughs not occur before the current answer deadline.
8. Plaintiff does not oppose a 45-day extension to March 8, 2024, for Defendant to respond to the Complaint.
9. This extension is sought in good faith and not for any dilatory reason.

**WHEREFORE**, Defendant GRMC, Inc. moves for an extension of time to and through **March 8, 2024**, to file its responsive pleading

Dated: January 18, 2024

Respectfully Submitted,

/s/ Gilbert S. Keteltas  
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*Attorney for GRMC, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 18, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

*/s/ Gilbert S. Keteltas*  
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